

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FEIN, SUCH, KAHN & SHEPARD, P.C.

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Attorneys for Secured Creditor
SHELLPOINT MORTGAGE SERVICING, as
servicer for MTGLQ INVESTORS, L.P.
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In Re:

CHARLES PATTERSON WRIGHT II

Debtor(s).

Case No.: 17-31543 RG

Adv. No.:

Chapter: 7

Hearing Date: February 6, 2018

Judge: Honorable Rosemary
Gambardella

**LIMITED OBJECTION OF SHELLPOINT
MORTGAGE SERVICING TO CHAPTER 7
TRUSTEE'S MOTION TO SELL PROPERTY
FREE AND CLEAR OF LIENS**

I, JILL A. MANZO, ESQ. , do hereby certify as follows:

1. I am an attorney at law of the State of New Jersey associated with the law firm of FEIN, SUCH, KAHN & SHEPARD, PC, attorneys for **SHELLPOINT MORTGAGE SERVICING**, ("Secured Creditor" herein), and I am fully familiar with the facts and circumstances of the within matter.

2. Secured Creditor holds a mortgage on Debtor's residence which is located at 28 Valley Road, Boonton, NJ 07005.

3. The Chapter 7 Trustee has filed a Motion to Sell Property

Free and Clear of Liens to which Secured Creditor respectfully objects for reasons which follow:

(a) Secured Creditor objects to language in the Proposed Order, Section H providing "The Trustee reserves his right to recover out of any payment to the secured creditor MTGLQ Investors, L.P., for the reasonable necessary costs and expenses of disposing of the Property"

(b) Secured Creditor objects to any purchase price that does not fully satisfy Secured Creditor's lien. The proceeds of the sale must be used to satisfy the lien on the real property and until such satisfaction, the real property is not free and clear of this lien.

4. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

FEIN, SUCH, KAHN & SHEPARD, PC.
Attorneys for the Secured
Creditor,

By: /S/JILL A. MANZO, ESQ.

DATED: January 30, 2018

cc: ARTHUR DAVID MALKIN, ESQ. - DEBTOR(S)' ATTORNEY
ERIC R. PERKINS, ESQ. - TRUSTEE